

# Holland & Knight

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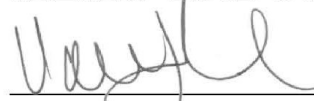
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July 26, 2024

**VIA ECF:**

The Hon. Magistrate Judge Valerie Figueredo  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, New York 10007

**MEMO ENDORSED**



HON. VALERIE FIGUEREDO  
UNITED STATES MAGISTRATE JUDGE  
DATED: August 7, 2024

Plaintiff's request to seal ECF No. 106-1 is granted. The Clerk of Court is respectfully directed to permanently maintain the viewing restrictions on ECF No. 106-1 and lift the viewing restrictions on ECF Nos. 106, 106-2, 106-3, and 106-4. The Clerk of Court is also directed to terminate the motion at ECF No. 107.

Re: RSS WFCM2018-C44 - NY LOD, LLC v. 1442 Lexington Operating DE LLC et al  
Case No. 21 cv-04424 (DLC)  
**Letter-Motion to Seal Exhibit A and to File Redacted Exhibit A**

Dear Magistrate Judge Figueredo:

We are counsel for plaintiff RSS WFCM2018-C44- NY LOD, LLC ("Plaintiff") in the above referenced action. Pursuant to rules 21.7(a)-(c), of the Electronic Case Filing Rules & Instructions for the United States District Court, Southern District, ("ECF Rules") we write to respectfully move this Court to permanently seal Exhibit A to the Declaration of Keith Brandofino, dated July 25, 2024 ("Exhibit A") (see ECF No 106) and to file redacted Exhibit A.

On July 25, 2024, we filed Exhibit A in furtherance of Your Honor's Order dated July 12, 2024 (see ECF No. 105) which inadvertently contains sensitive, confidential, and privileged information. On July 26, 2024, we contacted the ECF help desk to place Exhibit A under temporary seal. Thereafter, we were instructed to send this letter as an application for a permanent seal of Exhibit A. As such, we respectfully request that Your Honor accept this letter-motion to permanently seal Exhibit A, as well as to file redacted Exhibit A. (attached).

Plaintiff will promptly file a redacted version of Exhibit A to the Declaration of Keith Brandofino, as directed by the Court. We thank the Court for its attention to this matter.

Respectfully,

**HOLLAND & KNIGHT LLP**

By: /s/ Keith M. Brandofino  
Keith M. Brandofino, Esq.

cc: All parties of record via ECF

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